

furnished by BellSouth were inaccurate in that they always show a 4-wire DS1 UNE loop even when BellSouth provides the requested 4-wire DS1 digital loop via 2-wire HDSL. BellSouth admitted that the BellSouth engineering records were not changed for a number of the DS1 2-wire HDSL circuits. BellSouth's inability to provide and maintain accurate records represents an operational support system deficiency that must be corrected prior to BellSouth being able to demonstrate compliance with its section 271 obligations.

In BellSouth's Georgia 271 Reply Comments, BellSouth attempts to confuse this issue by stating that its provision of 2-wire HDSL circuits rather than the 4-wire DS1 circuits ordered by Cbeyond does not violate the parties' interconnection agreement. BellSouth attempts to justify its actions by classifying the 2-wire HDSL circuit as a 4-wire interface.

Cbeyond does not dispute that a 2-wire DS1 loop is classified as a 4-wire interface; however, this is a thinly veiled attempt to have the Commission overlook the issues raised by Cbeyond. In addition, the fact that a 2-wire DS1 loop is a 4-wire interface is irrelevant. Most telling is the fact that BellSouth does not refute that: (1) Cbeyond specifically orders 4-wire DS1 loops, not 4-wire DS1 interfaces; (2) the 2-wire HDSL circuits it is providing Cbeyond are of lesser quality than the 4-wire DS1 loops ordered which cause service degradation problems (i.e., higher bit rate deviation and latency); (3) the 2-wire HDSL circuits do not comply with the ANSI T1.403 industry standards which are required for 4-wire DS1 loops; (4) BellSouth's engineering records are not accurate – which BellSouth admitted to Cbeyond; and (5) BellSouth incurs less cost to provision 2-wire HDSL circuits than it does 4-wire DS1 circuits. To further clarify the 4-wire interface issue, Cbeyond notes that the Georgia Commission did not set, and BellSouth did not request, rates for 4-wire interfaces. Rather, the Commission established 4-wire loop rates for

DS1 loops.³² Therefore, Cbeyond should not be subjected to the higher rates of a 4-wire circuit when a 2-wire circuit is delivered to Cbeyond. Until such time as a 2-wire HDSL based DS1 loop rate is established, BellSouth will continue to be unjustly enriched with windfall profits at the expense of its competitors.

In an attempt to curb BellSouth's anti-competitive pricing scheme, and assuming BellSouth would not cease to provision 2-wire DS1 loops rather than the requested 4-wire DS1 loops, Cbeyond sent BellSouth a BFR for the provisioning of DS1 2-wire UNE loops on May 9, 2001. Cbeyond received BellSouth's response to its BFR on July 30, 2001 – almost three months after the BFR was submitted. Not surprisingly, BellSouth, rejected Cbeyond's BFR request for a 2-wire HDSL based DS1 offering.³³

In addition to increasing Cbeyond's cost of doing business as discussed above, Cbeyond is unfairly compensating BellSouth for its inappropriate provisioning of 2-wire HDSL circuits.³⁴ BellSouth incurs less cost to provision 2-wire HDSL circuits, than it does for 4-wire UNE DS1 circuits. BellSouth's provisioning of 2-wire HDSL circuits when 4-wire DS1 circuits are ordered amounts to deceptive trade and violates the parties' interconnection agreement, the Georgia

³² See Docket No. 10692-U. Also see BellSouth's Direct Testimony and Cost Study in Docket No. 14361-U.

³³ Cbeyond may be willing to accept 2-wire HDSL circuits, rather than 4-wire DS1 circuits, in some cases so long as the UNE rates accurately reflect the appropriate costs. Therefore, either rates must be established for 2-wire HDSL circuits or the 4-wire DS1 circuits should reflect the mix of 2-wire and 4-wire circuits to take into account the lower costs of the 2-wire HDSL circuits.

³⁴ Assuming BellSouth would not cease to provision 2-wire DS1 loops rather than the requested 4-wire DS1 Digital Loops, Cbeyond sent BellSouth a New Business Request for the provisioning of DS1 2-wire UNE loops on May 9, 2001. To date, BellSouth has not responded to Cbeyond's request. This document is available upon request if the Commission so desires.

Commission's Order in Docket 7061-U, and section 252(d) of the Act. If BellSouth is provisioning HDSL2 loops in the mix of DS1 loops, then their documentation and underlying cost and prices for DS1 loops should be reflective of the actual mix. Again, the fact that BellSouth fails to provide the UNE loops that Cbeyond orders, and that BellSouth purports to offer in its interconnection agreement, violates its obligation to provide UNEs on reasonable terms and conditions under Section 251(c)(3).

D. BellSouth's Proposed Pricing in Georgia Docket No. 14361-U for UNEs is not in Compliance with the Provisions of the Act and Cbeyond's Interconnection Agreement

The Georgia Commission has initiated a generic UNE cost docket to review BellSouth's current UNE rates to determine whether changes in BellSouth's network and forward looking technologies have resulted in the need to modify the existing UNE rates.³⁵ BellSouth filed its direct testimony and the public version of its cost study on October 1, 2001.³⁶ After an initial review of BellSouth's filing, it is quite perplexing how BellSouth can justify its proposed rates. For example, BellSouth has proposed a 49.32% increase in its zone 1 recurring DS1 UNE loop rate and a 64.77% increase in its zone 1 non-recurring DS1 UNE loop rate. Such tremendous increases, if allowed, would have serious consequences for the competitive telecommunications industry in Georgia. Cbeyond is confident that the Georgia Commission will appropriately address BellSouth's outrageous proposal; however, BellSouth should not be granted 271 relief

³⁵ Based on the current Procedural and Scheduling Order, a Georgia Commission decision on BellSouth's UNE rates is not expected until 1st Quarter 2002.

³⁶ As of October 15, 2001, BellSouth has not provided Cbeyond with the confidential version of BellSouth's cost study. As such, Cbeyond's comments in this filing are limited to its review of the public version cost study.

until the Georgia Commission has had an opportunity to examine and set the appropriate UNE rates.³⁷ It is interesting to note that even though BellSouth readily admits that DS1 UNE loops are provided with a mix of 2-wire copper, 4-wire copper, and fiber-based facilities, BellSouth's cost study reflects only the more expensive 4-wire copper loops.

VI. CONCLUSION

It is clear that BellSouth has not satisfied the 14-point competitive checklist and must not be granted Section 271 approval. BellSouth is either in violation of the parties' interconnection agreement or simply has not resolved very important issues, which are required in order to demonstrate that BellSouth has complied with the requirements of Section 271. Specifically, BellSouth fails with respect to the following items:

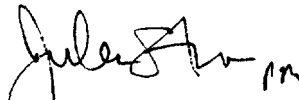
- BellSouth has failed to connect special access multiplexers to UNE loops, or alternatively convert Cbeyond's special access multiplexers to UNEs in accordance with the parties' interconnection agreement;
- BellSouth is not providing intervals for UNEs at parity with the intervals that it provides to itself;
- BellSouth has not implemented a mechanized process for ordering EELs;
- BellSouth has not established performance measures for DS1 UNE combinations, DS1 IOCs, and DS1 local channels;

³⁷ Cbeyond is in the process of examining BellSouth's proposed UNE rates. Cbeyond reserves the right to provide

(Footnote cont'd on next page)

- BellSouth is inappropriately providing 2-wire HDSL circuits to Cbeyond when 4-wire DS1 circuits are ordered which means Cbeyond receives a substandard service at rates that do not reflect the appropriate underlying costs; and
- BellSouth has proposed outrageous increases to its UNE rates, which, if enacted would have a devastating impact on competition in the state of Georgia.

For the foregoing reasons, BellSouth's 271 application for authority to provide in-region, interLATA services in the state of Georgia should be denied.



Julia O. Strow
 Vice-President Regulatory & Legislative
 Affairs
 Brian Musselwhite
 Director – Regulatory & Legislative Affairs
 Cbeyond Communications, LLC
 320 Interstate North Parkway, SE
 Suite 300
 Atlanta, Georgia 30339

(Footnote cont'd from previous page.)

additional documentation concerning BellSouth's proposed UNE rates in Cbeyond's Reply Comments to the FCC.

ATTACHMENT 1

Brian Musselwhite

From: Tom Hyde
Sent: Friday, August 17, 2001 9:46 AM
To: Mark Robbins (E-mail); David. B. Veasey (E-mail)
Cc: Julia Strow; Brian Musselwhite
Subject: Mechanized Ordering for EELs and NSCs

Cbeyond intends to commence mechanized ordering of Enhanced Extended Loops (EEL) and Non-switched Combinations (NSC) using the ASR process as ordered in Georgia Docket 11901-U (see attached). The ASR process will be used on an interim basis until BellSouth can implement the LSR mechanized process. Please furnish the methods and procedures for ordering EEL/NSCs via the ASR process. Please respond immediately with the time frame for furnishing those procedures.



Georgia PSC Order
effective Ma...

Tom Hyde

Cbeyond Communications
Phone 678-424-2467
Fax 678-424-2500
Cell 770-337-4557

ATTACHMENT 2

Tom Hyde

From: Change.Control@bridge.bellsouth.com
Sent: Wednesday, October 10, 2001 9:23 AM
To: Alan.Flanigan@twtelecom.com; alee@epicus.com; alejandro@amexcomm.com; amanda.hill@wcom.com; Annette.Cook@espire.net; annettey@Lightyearcom.com; apatel3@telcordia.com; Lynn.Arthur@BellSouth.com; avincent@communitytelephone.com; bbil@4pra.com; BellSouth@quintessent.net; best2@surfsouth.com; bethh@communitytelephone.com; beverly.lockwood@btitele.com; billg@telcordia.com; blsinterfacecontrol@kpmg.com; bmurdo@KMCTELECOM.COM; Bob.Buerrosse@allegiancetelecom.com; bobik@att.com; bradbury@att.com; Brenda.Gant@KMCTELECOM.COM; Brent.McMahan@networktelephone.net; bseigler@att.com; BStowe@City.marietta.GA.US; bszafran@covad.com; bwellman@idstelcom.com; c-david.burley@wcom.com; c-Lorraine.Watson@wcom.com; c_and_m@bellsouth.net; caren.schaffner@wcom.com; CAshford@birch.com; cassandrap@networktelephone.net; Catherine.Gray@alltel.com; cbnaadmin@home.com; cchiavatti@usatelecominc.com; cdiacovelli@att.com; CDrake@City.marietta.GA.US; Cecere.Chris@broadband.att.com; cecilia.ortiz@adelphiacom.com; Cedric.Cox@wcom.com; cflanigan@uslec.com; changecontrol.bellsouth@onepointcom.com; Chapmanwe@cep.com; charles.a.stahlberger@xo.com; charrison@mpowercom.com; chaynes@Trivergent.com; cheryl@eatel.com; cheryl_acosta@stratosoilandgas.com; chrisg@pvtel.net; Christine.Schnelle@wcom.com; christine.shelton@cc.gte.com; clarson@dset.com; chhawk@KMCTELECOM.COM; CoDavis@covad.com; colleen.e.sponseller@wcom.com; Connie@albionconnect.com; Connie.Nathan@KMCTELECOM.COM; conniec@arrowcom.com; Craig@excleron.com; Craig.B.Douglas@MCI.com; CSoptic@birch.com; cstl@bellsouth.net; daddymax@netbci.com; daisy.ling@wcom.com; DDougherty@birch.com; Debra.Pasquale@btitele.com; default.user@BellSouth.com; DElliott@connectsouth.com; desiree@communitytelephone.com; dfoust@deltacom.com; dgraham@MANTISS.com; dkane@aspiretelecom.com; dmcmanus@Trivergent.com; DNapovanice@birch.com; DoBeck@MediaOne.com; don@amexcomm.com; donna.poe@knology.com; donnas@intetech.com; Doreen.E.Raia@wcom.com; dpetry@ix.netcom.com; Dwight.Scrivener@wcom.com; dwilliams@nowcommunications.com; ed.ramsden@cc.gte.com; EFarnell@broadband.att.com; EGunn@birch.com; Ellen.Neis@mail.sprint.com; Elliot.Wrann@dsl.net; eodell@dset.com; epadfield@nextlink.com; ESaeed@northpoint.net; ESingleton@eztalktelephone.com; evdoty@nextlink.com; eyu@TALK.COM; Faye.Restaino@dsl.net; fjohnson@covad.com; fouts@communitytelephone.com; frankb@cellone-ms.com; Fred.Brigham@wcom.com; Gary@CSII.net; generalg@cris.com; george.forbes@accesscomm.com; gerrig@Lightyearcom.com; Glenn.Sonnier@usunwired.com; gmelvin@Trivergent.com; gulfcoast@dotstar.net; Hwhittington@mpowercom.com; ialvarez@commsouth.net; jamesk@onisn.net; jayala@rhythms.net; jbritton@phonesforall.com; Jdavid4715@aol.com; JDuffey@PSC.STATE.FL.US; Jeff.Walker@accesscomm.com; Jennifers@universaltelecominc.com; jfuller@fairpoint.com; JG6837@ctmail.snet.com; jhoze@KMCTELECOM.COM; jim.lee@dsl.net; Jim.Meyers@wcom.com; jjohnson@idstelcom.com; jmclau@KMCTELECOM.COM; JMMaxwell@Intermedia.com; JoanC@networktelephone.net; joanneb@networktelephone.net; JOliver@birch.com; jose.aguilar@btitele.com; jshields@globalc-inc.com; JtWilson2@att.com; jwengert@newsouth.com; jwilwerding@birch.com; KAnderson@nwp.com; karen.grim@mail.sprint.com; karind@covad.com; Katherine.Hudler@espire.net; kathryn_hinds@globalcrossing.com; Kathryn.Phipps@btitele.com; kcooper@EFTIA.com; Kevin@albionconnect.com; KGillette-Hoskins@quintessent.net; khudson@nextlink.com; Kimberly.O.Williams@MCI.com; KKester@STIS.com; kmarshall@telstar.org; kmiller@northpointcom.com; KPollard@birch.com; kschwart@covad.com; ktimmons@att.com; ktrygges@covad.com; KUchida@northpoint.net; Kyle.Kopytchak@networktelephone.net; launchnow.notify@cscocoe.accenture.com; lavernek@arrowcom.com; LCamillo@nwp.com; ldavidov@dset.com; len.chandler@btitele.com; LHamlin@birch.com; LHinton@PrismCSI.net; lijohnso@covad.com; linda@networkonecom.com; lindak@communitytelephone.com; lisa@annox.com; Lminasola@MediaOne.com; Lorraine.Watson@wcom.com; lortega@commsouth.net; lynn@mfn.net; lynnj@nowcommunications.com; Mandy.S.Jenkins@alltel.com; mark@annox.com; Mark.Mecca@dsl.net; Mary.I.Mitchell@xo.com; marybethkeane@kpmg.com; mattbeynon@ga.prestige.net; MatthewBaker@nwp.com; mcbrunnhilde@juno.com; mchappell@kpmg.com; MConnolly@birch.com; mconquest@itcdeltacom.com; mdominick@Trivergent.com; mer@networkwcs.com;

To: MGimmi@nuvox.com; michael.dekorte@Lightyearcom.com; Micki.Jones@wcom.com; microsun@bellsouth.net; mkennedy@newsouth.com; mmclaughlin@dset.com; MPatyk@connectsouth.com; msykes@telcordia.com; mt7210@momail.sbc.com; MWagner@birch.com; Nancy.Watt@RHTelCo.com; Natalie.Franklin@KMCTELECOM.COM; NDreier@birch.com; Nicole.Moorman@adelphiacom.com; nmunsie@commsouth.net; NStuckey@birch.com; PBarker@aol.com; PBohn@MediaOne.com; Pkinghorn@eztalktelephone.com; pmckay@momentumbusiness.com; PPinick@birch.com; prehm@nightfire.com; prichardson@Trivergent.com; PRubino@Z-TEL.com; PShah@EFTIA.com; Quan.Nguyen@KMCTELECOM.COM; Rae.Couvillion@wcom.com; rbennett@floridadigital.net; rbreckin@telcordia.com; rbuffa@interloop.net; rcostanzo@velocityky.com; Rdupraw@mpowercom.com; Renee.Clark@espire.net; Renee.Cliff@dsl.net; reym@networktelephone.net; rharsila@commsouth.net; rhonda.calvert@adelphiacom.com; Rick.Whisamore@wcom.com; rjohnson@epicus.com; robert@alternativephone.com; Ronald.Klamer@wcom.com; rturkel@broadriver.com; ruth@mfn.net; RWilson@City.marietta.GA.US; sandra.k.evans@mail.sprint.com; sandra.kahl@wcom.com; Sandrajf@intetech.com; sbowling@caprock.com; SchubertJ@birch.com; schula.hobbs@dsl.net; Scott.Hibbard@wcom.com; Selange.Roberts@espire.net; SELEAZER@TALK.COM; shane@eatel.com; shannon.smith@itchold.com; sharon.arnett@mail.sprint.com; Sherry.Lichtenberg@wcom.com; Shirley.Roberts@KMCTELECOM.COM; SLively@Trivergent.com; smason@interloop.net; smoore@Trivergent.com; snole@kpmg.com; srober@KMCTELECOM.COM; SStapler@itcdeltacom.com; SSullivan@nwp.com; Stacia.Edwards@KMCTELECOM.COM; Steve.Filliaux@btitele.com; Steve.Moore@mail.sprint.com; steve.sulak@nowcommunications.com; steve.taff@allegiancetelecom.com; suee@Lightyearcom.com; susan.sherfey@btitele.com; svc-gate@telcordia.com; swargo@rhythms.net; Taldinger@mpowercom.com; talleylinda@mindspring.com; tami.m.swenson@accenture.com; Tanya.Finney@espire.net; Tara.Odems@allegiancetelecom.com; TAYLORJG@LCI.COM; taziz@epicus.com; tfry@commsouth.net; Tim@excleron.com; timw@networkonecom.com; Travis.Tindal@om1.al.bst.bls.com; TJStokes@Trivergent.com; Tlescudero@idstelcom.com; tmontemayer@MANTISS.com; tntel@bellsouth.net; Todd@CSII.net; tom.hyde@Cbeyond.net; tonyam@communitytelephone.com; trsmith@Trivergent.com; ts1336@sbc.com; TThompson2@broadband.att.com; Tyra.Hush@wcom.com; usfloridaoss@kpmg.com; valarie_reck@globalcrossing.com; wendy.hernandez@comporium.com; WFletcher@birch.com; Williamsal@epb.net; wmknapek@Intermedia.com; wolfsbrg@cris.com; Yvette.Brown@espire.net; Zachary.Baudoin@KMCTELECOM.COM; bellsouth@nightfire.com; dreinig@att.com; cschneider@concretio.com; Lianne.Griffin@BellSouth.com; ssarem@mpowercom.com; pwilson@mpowercom.com; Debbie.Timmons@om1.al.bst.bls.com; Bill.York@wcom.com

Subject: ID: Clarification Letter - ASR Process for EELS



ASR_EELS.DOC

CLECs,

Please see attached clarification letter with regard to the ASR Process for EELS.

Please let us know if you have any questions.

Thanks,

Change Management Team

Distributed Message

Message sent by: Change Control /m6,mail6a

To unsubscribe from CCP, send a message to
list.manager@bridge.bellsouth.com with the Subject line: UNSUBSCRIBE CCP

For online help, send a message with the subject HELP.

CLECs:

The purpose of this letter is to amend a previous letter sent on September 18, 2001, to Tom Hyde of Cbeyond, and copied to all CCP members. The original letter was a response to his questions regarding EELs mechanization. While correct as written, BellSouth is providing this additional information to ensure that carriers understand completely their options for ordering EELs.

In addition to manually submitted Local Service Requests ("LSRs") for EELs (as mentioned in the original letter), and in advance of BellSouth's implementation of the capability to submit electronically LSRs for EELs, an alternative mechanized method is available. It is currently being utilized by MCI pursuant to an order of the Georgia Public Service Commission under terms of MCI's Interconnection Agreement with BellSouth, and can also be made available to other eligible CLECs upon request.

This alternative mechanized method involves the electronic submission of requests for special access services that are the technical equivalent of an EEL via the Access Service Request ("ASR") process normally used by interexchange carriers. BellSouth will manually convert those special access service ASRs to EELs requests, and process them according to standard EELs provisioning policies.

General methods and procedures exist for handling CLEC requests for EELs under this alternative method. However, once a CLEC indicates to its BellSouth Account Team its desire to utilize this process, and upon the amendment of the CLEC's Interconnection Agreement to incorporate appropriate language outlining this method, BellSouth requires 30 days to establish methods and procedures *specific to that CLEC* to ensure proper processing of the ASRs.

One additional note: Although BellSouth's Change Management Team is currently working with a change request for EELs mechanization, the alternative ASR method described herein is not under the purview of the CCP. Please contact your BellSouth Account Team representative for more information on this process, if needed.

Thanks,

Change Management Team

ATTACHMENT 3

Brian Musselwhite

From: Tom Hyde
Sent: Wednesday, September 19, 2001 8:19 AM
To: Brian Musselwhite
Subject: FW: RE: Updated 9/6 Release 10.3 Package Presentation

RE: Updated 9/6
Release 10.3 P...

-----Original Message-----

From: Change.Control@bridge.bellsouth.com
[mailto:Change.Control@bridge.bellsouth.com]
Sent: Tuesday, September 18, 2001 5:07 PM
To: Alan.Flanigan@twtelecom.com; alee@epicus.com;
alejandro@amexcomm.com; amanda.hill@wcom.com; Annette.Cook@espire.net;
annettey@Lightyearcom.com; apatel3@telcordia.com;
Lynn.Arthur@BellSouth.com; avincent@communitytelephone.com;
bbil@4pra.com; BellSouth@quintessent.net; best2@surfsouth.com;
bethh@communitytelephone.com; beverly.lockwood@btitele.com;
billg@telcordia.com; blsinterfacecontrol@kpmg.com;
bmurdo@KMCTELECOM.COM; Bob.Buerrosse@allegiancetelecom.com;
bobik@att.com; bradbury@att.com; Brenda.Gant@KMCTELECOM.COM;
Brent.McMahan@networktelephone.net; bseigler@att.com;
BStowe@City.marietta.GA.US; bszafran@covad.com; bwellman@idstelcom.com;
c-david.burley@wcom.com; c-Lorraine.Watson@wcom.com;
c_and_m@bellsouth.net; caren.schaffner@wcom.com; CASHford@birch.com;
cassandrap@networktelephone.net; Catherine.Gray@alltel.com;
cbnaadmin@home.com; cchiavatti@usatelecominc.com; cdiacovelli@att.com;
CDrake@City.marietta.GA.US; Cecere.Chris@broadband.att.com;
cecilia.ortiz@adelphiacom.com; Cedric.Cox@wcom.com; cflanigan@uslec.com;
changecontrol.bellsouth@onepointcom.com; Chapmanwe@cepb.com;
charles.a.stahlberger@xo.com; charrison@mpowercom.com;
chaynes@Trivergent.com; cheryl@eatel.com;
cheryl_acosta@stratosoilandgas.com; chrisg@pvtel.net;
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clarson@dset.com; clhawk@KMCTELECOM.COM; CoDavis@covad.com;
colleen.e.sponseller@wcom.com; Connie@albionconnect.com;
Connie.Nathan@KMCTELECOM.COM; conniec@arrowcom.com; Craig@excleron.com;
Craig.B.Douglas@MCI.com; CSoptic@birch.com; csti@bellsouth.net;
daddymax@netbci.com; daisy.ling@wcom.com; DDougherty@birch.com;
Debra.Pasquale@btitele.com; default.user@BellSouth.com;
DElliott@connectsouth.com; desiree@communitytelephone.com;
dfoust@deltacom.com; dgraham@MANTISS.com; dkane@aspiretelecom.com;
dmcmanus@Trivergent.com; DNapovanice@birch.com; DoBeck@MediaOne.com;
don@amexcomm.com; donna.poe@knology.com; donnas@intetech.com;
Doreen.E.Raia@wcom.com; dpetry@ix.netcom.com; Dwight.Scrivener@wcom.com;
dwilliams@nowcommunications.com; ed.ramsden@cc.gte.com;
EFarnell@broadband.att.com; EGunn@birch.com; Ellen.Neis@mail.sprint.com;
Elliot.Wrann@dsl.net; eodell@dset.com; epadfield@nextlink.com;
ESaeed@northpoint.net; ESingleton@eztalktelephone.com;
evdoty@nextlink.com; eyu@TALK.COM; Faye.Restaino@dsl.net;
fjohnson@covad.com; fouts@communitytelephone.com; frankb@cellone-ms.com;
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george.forbes@accesscomm.com; gerrig@Lightyearcom.com;
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ialvarez@commsouth.net; jamesk@onisn.net; jayala@rhythms.net;
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Jim.Meyers@wcom.com; jjohnson@idstelcom.com; jmclau@KMCTELECOM.COM;
JMMMaxwell@Intermedia.com; JoanC@networktelephone.net;
joanneb@networktelephone.net; JOliver@birch.com;
jose.aguilar@btitele.com; jshields@globalc-inc.com; JtWilson2@att.com;
jwengert@newsouth.com; jwilwerding@birch.com; KAnderson@nwp.com;
karen.grim@mail.sprint.com; karind@covad.com;
Katherine.Hudler@espire.net; kathryn_hinds@globalcrossing.com;
Kathryn.Phipps@btitele.com; kcooper@EFTIA.com; Kevin@albionconnect.com;
KGillette-Hoskins@quintessent.net; khudson@nextlink.com;
Kimberly.O.Williams@MCI.com; KKester@STIS.com; kmarshall@telstar.org;
kmiller@northpointcom.com; KPollard@birch.com; kschwartz@covad.com;
ktimmons@att.com; ktrygges@covad.com; KUchida@northpoint.net;
Kyle.Kopytchak@networktelephone.net;
launch-now.notify@cscoe.accenture.com; lavernek@arrowcom.com;
LCamillo@nwp.com; ldavidov@dset.com; len.chandler@btitele.com;
LHamlin@birch.com; LHinton@PrismCSI.net; lijohnso@covad.com;
linda@networkonecom.com; lindak@communitytelephone.com; lisa@annox.com;
Lminasola@MediaOne.com; Lorraine.Watson@wcom.com; lortega@commsouth.net;
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mark@annox.com; Mark.Mecca@dsl.net; Mary.I.Mitchell@xo.com;
marybethkeane@kpmg.com; mattbeynon@ga.prestige.net;
MatthewBaker@nwp.com; mcbrunnhilde@juno.com; mchappell@kpmg.com;
MConnolly@birch.com; mconquest@itcdeltacom.com;
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Subject: ID: RE: Updated 9/6 Release 10.3 Package Presentation

Tom,

This is in response to your email of 9/13/01 regarding EELS
mechanization.
BellSouth is not set up to receive neither LSRs nor ASRs electronically
for
EELS. However, the LCSC is prepared to accept a manual (paper) ASR via
fax
based on your Interconnection Agreement. If this is something that you
would
like to pursue, please contact your Account Team for assistance.

Sincerely,

Change Management Team

Distributed Message

Message sent by: Change Control /m6,mail6a

To unsubscribe from CCP, send a message to
list.manager@bridge.bellsouth.com with the Subject line: UNSUBSCRIBE
CCP

For online help, send a message with the subject HELP.

CERTIFICATE OF SERVICE

I, Valerie M. Steen, hereby certify that on this 22nd day of October 2001, copies of the foregoing Comments of Cbeyond Communications, LLC In Opposition to BellSouth's Application to Provide In-Region InterLATA Services in the State of Georgia were delivered by hand* or first-class mail to the following parties:

Magalie Roman Salas, Secretary*
Federal Communications Commission
9300 East Hampton Drive
Capitol Heights, MD 20743

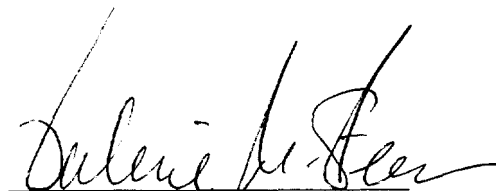
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